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UNITED STATES DISTRICT COURT DISTRICT OF OREGON PORTLAND DIVISION

RYANN GREGG,

CV No. 3:22-cv-01680-JR

Plaintiff,

v.

UNIVERSITY OF PORTLAND; MEGAN BURTON; and JANE DOE,

Defendants.

DEFENDANTS UNIVERSITY OF PORTLAND'S AND MEGAN BURTON'S UNOPPOSED MOTION FOR EXTENSION OF TIME TO REPLY TO PLAINTIFF'S RESPONSE TO DEFENDANTS' MOTION TO DISMISS AND SPECIAL ANTI-SLAPP MOTION TO STRIKE PURSUANT TO ORS 31.150

LR 7-1 CERTIFICATION

Counsel for University of Portland and Megan Burton ("University Defendants"), conferred with counsel for plaintiff Ryann Gregg about this motion requesting an extension of time to reply to Plaintiff's Response to Defendants' Motion to Dismiss and Special Anti-SLAPP

Page 1 - Defendants University of Portland's and Megan Burton's Unopposed Motion for Extension of Time to Reply to Plaintiff's Response to Defendants' Motion to Dismiss and Special Anti-SLAPP Motion to Strike Pursuant to ORS 31.150

Motion to Strike Pursuant to ORS 31.150 ("Plaintiff's Response"). Plaintiff does not oppose University Defendants' motion.

MOTION

In accordance with Fed R Civ P 6(b), and without waiver of any defense, the University Defendants move the court for an order extending the deadline in which to file and serve a reply to Plaintiff's Response to February 17, 2023. The current deadline is February 3, 2023.

MEMORANDUM

Plaintiff filed Plaintiff's Response on January 20, 2023, resulting in a deadline of February 3, 2023, for University Defendants to file a reply. Counsel for University Defendants have several competing deadlines in other matters, including for one attorney, a jury trial of probably seven to eight court days beginning on January 30, 2023. In order to prepare a reply addressing the points raised in Plaintiff's Response, University Defendants therefore seek an extension of the reply deadline to February 17, 2023. Counsel for University Defendants anticipate that depending on the length of the trial mentioned above and its impact on other matters, that they may need to seek an additional week's extension, but at this time hope to submit a reply, if this motion is granted, by February 17. This is the first request for an extension of time by the University Defendants to reply to Plaintiff's Response. This motion is not made for any improper purpose or to cause delay.

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Page 2 - Defendants University of Portland's and Megan Burton's Unopposed Motion for Extension of Time to Respond to Plaintiff's Response to Defendants' Motion to Dismiss and Special Anti-SLAPP Motion to Strike Pursuant to ORS 31.150

CONCLUSION

For the reasons stated above, University Defendants respectfully request that the Court enter an order extending the deadline to file a reply to Plaintiff's Response to February 17, 2023.

DATED this 24th day of January, 2023.

MILLER NASH LLP

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Defendants University of Portland's and Megan Burton's Unopposed Motion for Page 3 -Extension of Time to Respond to Plaintiff's Response to Defendants' Motion to Dismiss and Special Anti-SLAPP Motion to Strike Pursuant to ORS 31.150